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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TIMOTHY F.L. HAYES, a resident of	)	
the United Kingdom	)	
	)	
Plaintiff,	)	
v.	)	No.: 08 C 632
	)	
FIRST CHICAGO MORTGAGE CO., an	)	
Illinois corporation, JASON J. LAMBERT,	)	
an Illinois resident, KROLL FACTUAL	)	
DATA CORPORATION, a Colorado	)	
corporation, JOHN DOES 1-5, and ABC	)	
CORPORATIONS 1-5,	)	
	)	
Defendants.	)	

**DEFENDANT, FIRST CHICAGO MORTGAGE CO.'S, MOTION TO APPEAR AND  
FOR ENLARGEMENT OF TIME TO RESPOND TO CIVIL COMPLAINT**

NOW COMES the Defendant, FIRST CHICAGO MORTGAGE CO., by and through its attorneys, KEVIN W. DOHERTY, TODD E. MACEY, and DOHERTY & PROGAR, LLC, and requests leave to file its appearance, and pursuant to Federal Rule of Civil Procedure 6(b)(1), requests an enlargement of time, up to and including April 11, 2008, within which to respond to the Plaintiff's Civil Complaint. In support of this Motion, the Defendant states as follows:

1. The Plaintiff filed its Complaint on January 29, 2008.
2. The Defendant was served with a Summons and Complaint on February 26, 2008.
3. The Defendant is not contesting service.
4. The Defendant reasonably requires up to April 11, 2008, to prepare and file a Response to the Plaintiff's Civil Complaint.
5. This enlargement of time is not intended to harass the Plaintiff or delay the resolution of this matter. The granting of this Motion would in no way prejudice the Plaintiff.

6. Plaintiff's counsel has indicated that he is amenable to an Extension through April 9, 2008.

WHEREFORE, the Defendant, FIRST CHICAGO MORTGAGE CO., requests leave to file its appearance and that an enlargement of time to respond to the Plaintiff's Complaint, up to and including April 11, 2008, be granted.

Respectfully Submitted,

DOHERTY & PROGAR, LLC

/s/ Kevin W. Doherty  
Attorney for the Defendant

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